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By ECF

January 23, 2023

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

**Re: City of Philadelphia et al. v. Bank of America, N.A., et al.,
19-cv-1608 (JMF)**

Dear Judge Furman:

Defendants in the above-captioned action respectfully seek leave to file a brief of up to 50 pages in opposition to Plaintiffs' motion for class certification (ECF Nos. 362, 363). Plaintiffs do not oppose this request.

Leave to file a 50-page brief should be granted for the following reasons. First, this is a complex antitrust class action in which Plaintiffs (i) allege that eight separate Defendants engaged in an eight-year antitrust conspiracy and (ii) seek certification of both an antitrust class and multiple breach of contract subclasses consisting of over 12,000 daily and weekly VRDOs. Second, this Court granted leave to file 50-page briefs at the motion to dismiss stage, and the issues at the class certification stage are far more voluminous and complex. Third, Plaintiffs submitted two lengthy expert reports, over 1,400 pages of additional evidentiary materials, and a forty page brief in support of their motion. Finally, Plaintiffs have stated that they have no objection to a 50-page opposition brief provided that Defendants do not object to the submission of a 25 page reply brief, and Defendants have no objection to a reply brief of that length.

Defendants respectfully submit that leave to file a 50-page opposition brief should be granted.

Respectfully submitted,

/s/ Robert Wick
Robert Wick

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Counsel for the JPMorgan
defendants writing on behalf
of all Defendants